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Filing date: **09/07/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91200786
Party	Plaintiff United Global Media Group, Inc.
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Application Serial No. 85155593  
Filed: October 19, 2010  
Mark: BEAUTV  
Published for Opposition: March 22, 2011

UNITED GLOBAL MEDIA GROUP, INC.,

Opposer,

v.

BONNIE TSENG,

Applicant.

Opposition No. 91200786

**OPPOSITION TO APPLICANT'S MOTION TO EXTEND TIME TO ANSWER**

United Global Media Group, Inc. ("UGMG") opposes the 60 day extension of time to answer requested by the Applicant Bonnie Tseng ("Applicant"). Applicant, who did not confer with UGMG prior to filing, has not shown good cause that she should be afforded additional time to file an answer. *See* TBMP § 509 *incorporating* Fed. R. Civ. P. 6(b) ("when an action must be done within a specified time, the court may, for good cause, extend time").

Applicant had 40 days from the filing of the Notice of Opposition to prepare a short answer admitting or denying the allegations contained therein. Applicant has provided no reason why this time period was insufficient. The mere conclusory claim of extenuating circumstances, without any hint as to what those circumstances may be, does not meet the good cause standard. *See* TBMP § 509(a) ("A motion must set forth with particularity the facts said to constitute good cause for the requested extension; mere conclusory allegations lacking factual detail are not sufficient").

Likewise, Applicant's statement regarding requiring more time to "gather resources" is

insufficient to secure the requested extension. Not only does this statement not provide the particularity required by the rule, it also does not demonstrate that the Applicant diligently attempted to gather whatever resources required in the time period allotted. *See* TBMP § 509(a) (a party moving to extend time must demonstrate that the requested extension of time is not necessitated by the party's own lack of diligence or unreasonable delay").

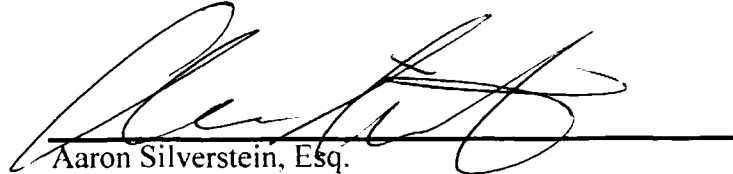
Thus, because Applicant has not satisfied the good cause standard, UMG respectfully requests that the Board deny the motion for an extension of time.

Respectfully submitted,

UNITED GLOBAL MEDIA GROUP, INC.

By its attorneys,

Dated: September 7, 2011

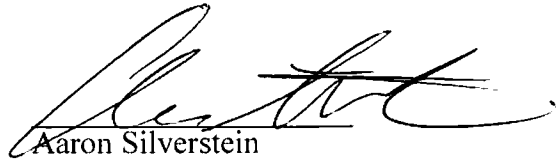
A handwritten signature in black ink, appearing to read 'A. Silverstein', is written over a solid horizontal line.

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**CERTIFICATE OF SERVICE**

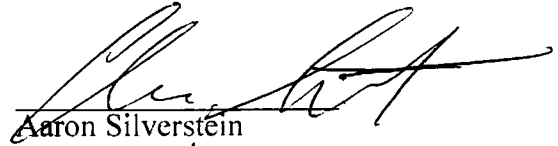
I hereby certify that a true and complete copy of the foregoing **OPPOSITION TO APPLICANT'S MOTION TO EXTEND TIME TO ANSWER**, along with all exhibits thereto, has been served on the Applicant, as set forth below, on September 7, 2011, via first class mail, postage pre-paid to:

Bonnie Tseng  
3020 LaVista Court  
Decatur, GA 30033  
United States

  
Aaron Silverstein

**CERTIFICATE OF TRANSMISSION**

I hereby certify that this correspondence is being submitted electronically via ESTTA on date shown below to the United States Patent and Trademark Office.

  
Aaron Silverstein  
Date: September 7, 2011